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M.D., PH.D and Robert Odell,
M.D., PH.D. Medical Enterprises,
A Nevada Corporation*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

The Parties, through their undersigned counsel, respectfully request the Court extend the discovery Motion and briefing deadlines set forth in the Court's Order dated November 14, 2017 and would state in support thereof as follows:

1. Pursuant to the Court's Order, Plaintiff was provided the opportunity to conduct discovery necessary to support its jurisdictional allegations. Said discovery would include in part, three depositions. In this matter, said depositions are corporate depositions of the defendant agency and two other large corporate entities. Document production has been requested as well. The parties have conferred and coordinated the deposition of several representatives, locations, availability and document production. The document production involved obtaining records stored off sight and requires a

1 detailed review of thousands of pages in order to determine relevant material. This
2 process now appears complete.

3 2. The Parties have conducted several scheduling telephone conferences
4 which have included third party Noridian Healthcare Solutions, the Regional Medicare
5 Contractor responsible for processing many of the claims described in the Complaint.
6 The deposition of Noridian Healthcare Solutions was taken November 14, 2017 in Fargo
7 North Dakota. The deposition of Qualified Independent Contractor for the Defendant is
8 scheduled to take place in Jacksonville, Florida on December 12, 2017. Defendant's
9 corporate representatives (three) are now scheduled to take place on January 5, 2018 in
10 Baltimore, Maryland. Defendant will be producing its representatives in Baltimore,
11 Maryland.

12 3. The deposition of Defendant's corporate representatives previously
13 scheduled for Dec 18, 2017 has been re-scheduled for January 5, 2018 in Baltimore
14 Maryland. This re-scheduling was necessary due to a healthcare emergency involving
15 Plaintiff's counsel (Mr. Brew). Due to unforeseen circumstances a small additional
16 amount of time is necessary to complete the Discovery in question through January 5th.

17 4. The Parties respectfully request the Court extend the deadline for
18 discovery through January 5, 2018 with dispositive motions due February 16, 2018,
19 Responses due March 9, 2018 and Replies due March 30, 2018.

20
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22 Acting United States Attorney
District of Nevada
23 /s/ Roger Wenthe
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27 /s/ George K. Brew
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2 **CERTIFICATE OF SERVICE**
3

4 The undersigned certifies that the following were served with a copy of the foregoing
5 document on the date and by the method of service identified below:
6

7 CM/ECF
8

9 All counsel of record
10

11 Dated: December 12, 2017
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13 IT IS SO ORDERED:
14

15 

16 RICHARD F. BOULWARE, II
17 United States District Judge
18

19 DATED this 22nd day of January, 2018.
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21 /s/ George K. Brew
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